

REMARKS

The Applicant respectfully requests entry of the above amendment and reconsideration in view of the amendment and the following remarks.

The amendments to the claims correct obvious grammatical errors that the applicant was not previously aware of. The amendments were not statutorily necessary for the allowance of the claims those skilled in the art in view of the disclosure of the application would have understood the claims without the above amendments and thus, do not limit the equivalence of the claims.

Claims 1, 10 and 25 have been amended so that the language is consistent with claim 16 to simplify presentation of the arguments below. The amendment broadens the claims because only the determination of direction is required to depend on the video signals.

Regarding the rejections of the claims, applicant respectfully traverses the assertions in the previous office action.

In response to the rejection of claims 3 and 4 under 35 USC 112, 2nd ¶, because in claim 3, "the multimodal integration architecture system" is allegedly indefinite because it lacks antecedent basis, applicant traverses the rejection because there is no requirement in section 112 for antecedent basis, and those skilled in the art in view of the disclosure of the application would have understood the claim without amendment. This is merely an obvious grammatical error. The claim has been broadened to eliminate the requirement for a "multimodal integration architecture system".

In response to the rejection of claims 1-2, 5-8, 10-24 under 35 USC 102(b), allegedly for being anticipated by US5686957 to

Baker, the citation does not identically disclose every element of the claims.

More specifically with regard to claims 1, 10, 16 and 24, Baker does not suggest, "the determination of direction depending at least at times on the image signals" as in claims 1, 10, 16 and 24. In Baker the only suggested method for determining direction is the speaker depends only on the audio signals. All the other rejected claims are dependent on claims 1, 10, 16 or 24 and are thus, allowable for at least the same reasons as those claims.

The transform processor engine in Baker does not determine a direction depending on image signals.

In response to the rejection of claim 3 under 35 USC 103(a) for allegedly being unpatentable over Baker in view of WO 99/60788 to Potts, this combination of citations does not suggest combining "a stationary image pickup device, remaining motionless during operation" with "the determination of direction depending at least at times on the image signals" as in claim 1 on which claim 4 depends.

In order to make a prima facie showing of obviousness, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. There is nothing in the office action indicating any suggestion or motivation in either of the combined citations or any other citations, for combining "a stationary image pickup device, remaining motionless during operation" with "the determination of direction depending at least at times on the image signals".

Also, in order to make a prima facie showing of obviousness, a reasonable expectation of success must be found in the prior art, and not based on Applicants' disclosure. There is no indication in

the combination of Baker and Potts or any other patent cited by the examiner that "a stationary image pickup device, remaining motionless during operation" can be successfully combined with "the determination of direction depending at least at times on the image signals", as in claim 1 on which claim 4 depends. There is no indication anywhere that the modified fish eye lens and image warping algorithm proposed by Baker would likely provide an image of sufficient quality for use in the person recognition algorithm of Potts. The examiner should cite references indicating that at the time of the invention herein, those skilled in the art would expect successful operation of the combination of Baker and Potts.

In response to the rejection of claims 9 and 25 under 35 USC 103(a) for allegedly being unpatentable over Baker in view of US patent 5,778,082 to Chu, this combination of citations does not suggest combining "a stationary image pickup device, remaining motionless during operation" with "the determination of direction depending at least at times on the image signals" as in claim 1 on which claims 9 and 25 depend.

Again, in order to make a prima facie showing of obviousness, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. There is nothing in the office action indicating any suggestion or motivation in either of the combined citations or any other citations for combining "a stationary image pickup device, remaining motionless during operation" with "the determination of direction depending at least at times on the image signals".

In response to the rejection of claims 1-8 and 10-24 under 35 USC 103(a) for allegedly being unpatentable over Potts in view of

Baker or US6704048 to Malkin, the combination of citations does not suggest all the elements of the claims. More specifically with regard to claims 1, 10, 16 and 24, this combination of citations does not suggest combining "a stationary image pickup device, remaining motionless during operation" with "the determination of direction depending at least at times on the image signals" as in claims 1, 10 and 16. All of the other claims 2-9, 11-15, and 17-23 are dependent on one of claims 1, 10 and 16 and are allowable for at least the same reasons as claims 1, 10 and 16.

Again, in order to make a prima facie showing of obviousness, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. There is nothing in the office action indicating any suggestion or motivation in either of the combined citations or any other citations for combining "a stationary image pickup device" with "the determination of direction depending at least at times on the image signals".

The examiner's statement that "it is old and well known in the art to replace mechanical pan, tilt, zoom cameras with camera that have electronic pan, tilt, zoom (EPTZ) to eliminate manual operation of the camera, improve reliability and reduce cost of the system" is without merit, because that has nothing to do with combining "a stationary image pickup device, remaining motionless during operation" with "the determination of direction depending at least at times on the image signals" as in claims 1, 10, 16 and 24.

In response to the rejection of claims 9 and 25 under 35 USC 103(a) for allegedly being unpatentable over Potts in view of Baker or US6704048 to Malkin, and further in view of US5778082 to Chu, the combination of citations does not suggest all the elements of the claims.

More specifically with regard to claims 9 and 25, this combination of citations does not suggest combining "a stationary image pickup device, remaining motionless during operation" with "the determination of direction depending at least at times on the image signals" as in claims 1 on which claims 9 and 25 depend.

Again, in order to make a prima facie showing of obviousness, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. There is nothing in the office action indicating any suggestion or motivation in either of the combined citations or any other citations for combining "a stationary image pickup device, remaining motionless during operation" with "the determination of direction depending at least at times on the image signals".

The claims are definite and distinguished from the citations and Applicant respectfully requests the allowance of all claims.

The Commissioner is hereby authorized to credit any overpayment or charge any fee (except the issue fee) including fees for any required extension of time, to Account No. 14-1270.

Respectfully submitted,

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